

Presentment Date: September 2, 2021 at 10:00 a.m. (E.T.)

Objection Deadline: August 30, 2021 at 4:00 p.m. (E.T.)

Andrew K. Glenn
Shai Schmidt
Rich Ramirez
Naznen Rahman
GLENN AGRE BERGMAN & FUENTES LLP
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600

Proposed Counsel to Debtor Ninety-Five Madison Company, L.P.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____) Chapter 11
In re:)
) Case No. 21-10529 (SHL)
NINETY-FIVE MADISON)
COMPANY, L.P.,)
)
Debtor.)
_____)

**NOTICE OF PRESENTMENT OF STIPULATION
AND ORDER FOR SUBSTITUTION OF COUNSEL**

PLEASE TAKE NOTICE that on August 20, 2021, Ninety-Five Madison Company, L.P. (the “Debtor”) entered into that certain *Stipulation and Order for Substitution of Counsel* (the “Stipulation”) substituting as their counsel of record Andrew K. Glenn, Shai Schmidt, Rich Ramirez and Naznen Rahman, of the law firm Glenn Agre Bergman & Fuentes LLP, in the place and stead of Charles E. Simpson, David Lopez and Edmund Troya, of the law firm Windels Marx Lane & Mittendorf, LLP.

PLEASE TAKE FURTHER NOTICE that the Stipulation will be presented to the Honorable Sean H. Lane, United States Bankruptcy Judge for the Southern District of New York (the “Court”), for signature on September 2, 2021 at 10:00 a.m. (E.T.).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Stipulation shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York and all General Orders applicable to Chapter 11 cases in this Court; (c) be filed with the Clerk of the Court in accordance with the customary practices of the Court and General Order M-399 (with a courtesy copy delivered to the Chambers of the Honorable Sean H. Lane, United States Bankruptcy Judge); and (d) be served upon and received by Glenn Agre Bergman & Fuentes LLP, 55 Hudson Yards, 20th Floor, New York, NY 10001 (Attn: Andrew K. Glenn, Shai Schmidt, Rich Ramirez and Naznen Rahman); Windels, Marx, Lane & Mittendorf, LLP, 156 West 56th Street, New York, New York 10019 (Attn: Charles E. Simpson); and the Office of the United States Trustee for Region 2, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard Morrissey, Esq.), in accordance with General Order M-399, no later than **August 30, 2021 at 4:00 p.m. (E.T.)**. (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if an objection is not filed and served by the Objection Deadline, there will not be a hearing and the Stipulation may be signed.

PLEASE TAKE FURTHER NOTICE that if an objection is filed and served by the Objection Deadline, a hearing (the “Hearing”) will be held to consider the Stipulation before the Honorable Sean H. Lane, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that if an objection is filed and served by the Objection Deadline, the Court will notify the moving and objecting parties of the date and time of the Hearing.

PLEASE TAKE FURTHER NOTICE that in light of the Court’s General Order M-543 (“General Order M-543”), dated March 20, 2020, the Hearing will only be conducted

telephonically. Parties wishing to participate in the Hearing must make arrangements through CourtSolutions LLC. Instructions to register for CourtSolutions LLC are attached to the General Order M-543.

PLEASE TAKE FURTHER NOTICE that the Stipulation has been filed electronically with the Clerk of the Court and may be reviewed by all registered users of the Court's website at: <http://www.nysb.uscourts.gov>.

Dated: August 23, 2021
New York, New York

By: /s/ Andrew K. Glenn
Andrew K. Glenn
Shai Schmidt
Rich Ramirez
Naznen Rahman
GLENN AGRE BERGMAN & FUENTES LLP
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600
E-mail: aglenn@glennagre.com
sschmidt@glennagre.com
rramirez@glennagre.com
nrahman@glennagre.com

*Proposed Counsel to Debtor Ninety-Five Madison
Company, L.P.*

Presentment Date: September 2, 2021 at 10:00 a.m. (E.T.)

Objection Deadline: August 30, 2021 at 4:00 p.m. (E.T.)

Andrew K. Glenn
Shai Schmidt
Rich Ramirez
Naznen Rahman
GLENN AGRE BERGMAN & FUENTES LLP
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600

Proposed Counsel to Debtor Ninety-Five Madison Company, L.P.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____) Chapter 11
In re:)
) Case No. 21-10529 (SHL)
NINETY-FIVE MADISON)
COMPANY, L.P.,)
)
Debtor.)
_____)

STIPULATION AND ORDER FOR SUBSTITUTION OF COUNSEL

IT IS HEREBY STIPULATED AND ORDERED that Ninety-Five Madison Company, L.P. (the “Debtor”) substitutes as its attorneys of record, Andrew K. Glenn, Shai Schmidt, Rich Ramirez and Naznen Rahman, of the law firm GLENN AGRE BERGMAN & FUENTES LLP (“Glenn Agre”), 55 Hudson Yards, 20th Floor, New York, New York 10001, in the place and stead of Charles E. Simpson, David Lopez and Edmund Troya, of the law firm WINDELS MARX LANE & MITTENDORF, LLP (“Windels Marx”), 156 West 56th Street, New York, New York 10019, in the above-referenced Chapter 11 case, effective as of August 19, 2021.

All future pleadings and correspondence directed to the Debtor in this matter should be directed to Andrew K. Glenn, Shai Schmidt, Rich Ramirez and Naznen Rahman at the following address:

Andrew K. Glenn
Shai Schmidt
Rich Ramirez
Naznen Rahman
GLENN AGRE BERGMAN & FUENTES LLP
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600
E-mail: aglenn@glennagre.com
sschmidt@glennagre.com
rramirez@glennagre.com
nrahman@glennagre.com

Glenn Agre shall serve as counsel for the Debtor with respect to all outstanding and future matters in this Chapter 11 case. Windels Marx shall continue to facilitate the transition to Glenn Agre as counsel for the Debtor, and upon completion of the transition to Glenn Agre as counsel, Windels Marx shall file with the Bankruptcy Court its Application for an award of fees and disbursements for its legal services rendered and disbursements incurred during the period where it was counsel to the Debtor, including the period of Windel Marx's facilitation of the transition to Glenn Agre as counsel for the Debtor.

[Signatures on Next Page]

Dated: August 23, 2021
New York, New York

By: /s/ Andrew K. Glenn
Andrew K. Glenn
Shai Schmidt
Rich Ramirez
Naznen Rahman
GLENN AGRE BERGMAN & FUENTES LLP
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600
E-mail: aglenn@glennagre.com
sschmidt@glennagre.com
rramirez@glennagre.com
nrahman@glennagre.com

*Proposed Counsel to Debtor Ninety-Five Madison
Company, L.P.*

By: /s/ Charles E. Simpson
Charles E. Simpson
WINDELS MARX LANE & MITTENDORF, LLP
156 West 56th Street
New York, New York 10019
Telephone: (212) 237-1000
Facsimile: (212) 262-1215
E-mail: csimpson@windelsmarx.com

*Former Counsel to Debtor Ninety-Five Madison
Company, L.P.*

SO ORDERED THIS ____ DAY OF AUGUST, 2021

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE